

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANAIIKA QUAMINA,	:	
	:	
Plaintiff,	:	No. 21 Civ. 1878 (PGG)(BCM)
	:	
v.	:	
	:	DECLARATION IN SUPPORT
LAUREN CRAMPSIE and JASON	:	OF DEFENDANTS' MOTION
LOTKOWICTZ,	:	TO DISMISS PLAINTIFF'S
	:	COMPLAINT
Defendants.	:	
-----X		

GIANFRANCO J. CUADRA, an attorney duly admitted to practice in the Southern District of New York, declares the following under penalty of perjury:

1. I am a partner at Pechman Law Group PLLC. Louis Pechman, the principal of Pechman Law Group PLLC, and I represent defendants Lauren Crampsie and Jason Lotkowictz in this Action.

2. I am familiar with the facts and circumstances described in this declaration, which I submit in support of Defendants' Motion to Dismiss Plaintiff's Complaint.

3. Attached as Exhibit A is a true and correct copy of Plaintiff's Complaint, filed on the Court's electronic docket on March 3, 2021 (ECF No. 1).

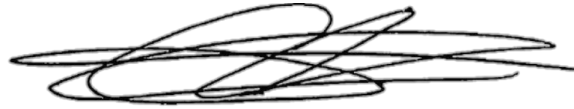
4. Attached as Exhibit B are text messages exchanged between the Parties, bates stamped Defs.' Ex. B at P000001-09.

5. Attached as Exhibit C is an email, with one attachment, which Plaintiff's attorney sent Defendants on December 27, 2020. Exhibit C is bates stamped Defs.' Ex. C at P000001-14.

6. Attached as Exhibit D is an email that Defendants sent Plaintiff on February 9, 2021. Exhibit D is bates stamped Defs.' Ex. D at P000001-02.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York
November 15, 2021

A handwritten signature in black ink, consisting of several overlapping loops and horizontal strokes, positioned above a horizontal line.

Gianfranco J. Cuadra, Esq.